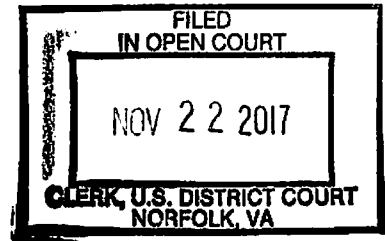


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 2:17cr135
)
ALLANTE MARTANAZE ARRINGTON,)
)
) Defendant.
)

STATEMENT OF FACTS

The parties stipulate that the allegations in Count One of the Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt:

1. At all times relevant to the pending Indictment and this Statement of Facts, ALLANTE MARTANAZE ARRINGTON ("MR. ARRINGTON") was an active duty member and Third Class Petty Officer in the United States Navy ("USN"). In August, 2017, Mr. Arrington was attached to the USS OAK HILL (LSD-51), which is homeported at Joint Expeditionary Base Little Creek (JEBLC). Accordingly, Mr. Arrington works primarily aboard JEBLC. JEBLC is a USN installation located in Virginia Beach, Virginia, in the Eastern District of Virginia.

2. On August 2, 2017, several buildings and naval assets located aboard JEBLC received telephonic communications conveying that bombs were prepared to explode at or near those buildings and assets.

3. Specifically, on August 2, 2017, the Navy Region Mid-Atlantic Regional Dispatch Center ("RDC") received phone calls, from the same individual, at approximately 6 a.m. and

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6:40 a.m. Eastern Standard Time (EST). The caller dialed a number associated with the JEBLC local emergency line. This number routes to the RDC located aboard Naval Station Norfolk. The RDC handles all emergency calls for USN installations in the Hampton Roads area. In the 6:00 a.m. call, a male caller conveyed that “three bombs will go off on base at 0930.” The witness receiving the call attempted to ascertain on which base the alleged bombs were located, but the caller hung-up. In the 6:40 a.m. call, the caller conveyed to the same witness at the RDC that “I’m about to blow this bitch up.” The witness again asked which base was the target, whereupon the caller hung-up.

5. On the same day, August 2, 2017, at approximately 11:00 a.m. (EST), a caller contacted the JEBLC quarterdeck and stated there was a “bomb on the GUNSTON HALL, Pier 16 area.” The witness who fielded this call in fact had received several calls immediately prior that were largely unintelligible, except for the words: “GUNSTON HALL.” The witness believed that based on the caller’s voice, it was the same individual making each call. The number was marked private on the quarterdeck caller ID, which is indicative of a caller attempting to mask their number from the caller ID system. When the witness asked for amplifying details, the caller again hung-up.

6. At approximately 1:00 p.m. (EST), on August 2, 2017, a witness at the Rockwell Gym aboard JEBLC responded to a similarly suspicious call that presented in the caller ID as “private.” In that call, a male caller stated, “there is a bomb on the USS OAK HILL, on Pier 16.” The call then disconnected.

7. On the same day, August 2, 2017, the stateroom associated with the Commanding Officer of the USS WHIDBEY ISLAND received a suspicious phone call. At approximately

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3:49 p.m. (EST), a male caller conveyed to a witness “there is a bomb onboard the USS WHIDBEY ISLAND galley.” The stateroom telephone does not have caller ID capability, but did display that the call came from a number not associated with the ship itself. As a result of this call, the Commanding Officer of the USS WHIDBEY ISLAND immediately ordered a sweep of the galley area aboard the ship. The ship was already on a shelter in place order due to the communications received earlier in the day, at the other locations aboard JEBLC.

8. The USN uses “Centrex” (Central Office Exchange Service) to handle JEBLC’s telecommunications interfaces. Centrex is a system operated and managed exclusively by Verizon Wireless. Centrex is a managed, network-hosted communications service where communication exchanges are made to a Verizon central office as opposed to a Navy-owned communications service. Essentially, the Navy outsources this service to Verizon, and accordingly, Verizon Wireless maintains incoming call data for calls made to JEBLC.

9. On August 2, 2017, the Naval Criminal Investigative Service (“NCIS”) sought information on the source of the calls. NCIS first sent an “Emergency Situation Disclosure” request to Verizon Wireless’ Security Assistance Team (“VSAT”) requesting production of incoming call information for August 2, 2017, between the times of 5:45 a.m. and 1:15 p.m. Incoming call information was sought specifically for the numbers associated with the Rockwell Gym, JEBLC Quarterdeck, and RDC.

10. On August 4, 2017, NCIS reviewed the data provided by the VSAT which included all incoming calls to the Rockwell Gym, RDC, and quarterdeck locations. The records identified 15 possible numbers that could have been the source of the threatening calls based on the time associated with each call, and the number dialed. Further review of the records

revealed that these 15 matches were “masked hub site” numbers associated with T-Mobile Wireless callers. Accordingly, NCIS concluded that a T-Mobile caller was the source of the suspicious communications on August 2, 2017.

11. On August 4, 2017, NCIS sent T-Mobile Wireless an “Exigent Circumstances” disclosure request asking that T-Mobile provide further information, including unmasked numbers, associated with the incoming T-Mobile calls to the various locations that received malicious communications. Specifically, NCIS requested incoming call information for the RDC, from 5:45 a.m. to 9:30 a.m.; the JEBLC quarterdeck from 8:30 a.m. to 12:00 p.m.; the Rockwell Gym from 12:30 p.m. to 1:30 p.m.; and the CO’s stateroom aboard the USS WHIDBEY ISLAND from 3:00 p.m. to 4:15 p.m.

12. T-Mobile provided details for all incoming T-Mobile calls to the locations requested, within the timeframes requested. T-Mobile provided call times in Coordinated Universal Time (UTC), which is 4 hours ahead of Eastern Standard Time.

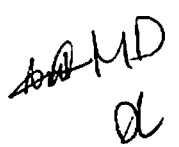
13. T-Mobile disclosed 5 T-Mobile calls to the RDC during the relevant timeframe, each by the same number. Those calls came in at times of 09:53, 09:56, 09:59, 10:39, and 13:04. When translated to EST, the calls made at 09:59, and 10:39 were consistent in time, and duration, with the threatening communications received by the RDC. For each call, T-Mobile identified a “calling number” of 1-757-949-6306, a dialed number of *67-757-462-4444, and an IMEI number of 357730060731110. IMEI numbers are essentially serial numbers given to a particular cellular device by its cellular service provider.

14. T-Mobile disclosed 17 T-Mobile calls to the JEBLC quarterdeck during the timeframe requested. A total of 4 T-Mobile numbers made calls within that timeframe. One

of the numbers disclosed was, again, 1-757-949-6306. Specifically, that number made calls to the quarterdeck at times of 09:50:03, 09:50:17, 09:52:10, 13:06:05, 13:06:20, 13:09:10, 13:24:38, 13:25:02, 14:29:12, 14:29:21, 14:59:48 and 15:00:02 (UTC). Several of these calls ended before connecting, but the call made at 15:00:02 was successfully completed and consistent in time (when translated to EST), and duration, with the threatening communication received by the JEBLC quarterdeck. The number dialed each time by the calling number ending in 6306 was either 1-757-462-7385, or *67 757-462-7385. The IMEI number associated with each call was, again, 357730060731110.

15. T-Mobile revealed 11 calls made to the number associated with the Rockwell Gym for the timeframe and date associated with the NCIS request. 5 T-Mobile numbers were responsible for these calls. One of these 5 numbers was, again, 1-757-949-6306. That number was responsible for 7 total calls, at times of 16:58:10, 16:58:35, 16:59:06, 19:35:45, 19:36:57, 19:37:38 and 19:38:04, UTC. Several of these calls did not successfully connect, but the call made at 16:58:35 completed successfully and was consistent in time (when translated to EST), and duration, with the threat received by the Rockwell Gym. The number dialed each time by the calling number ending in 6306 was either 1-757-462-7735, or *67 757-462-7735. The IMEI associated with each call was again, 357730060731110.

16. T-Mobile further provided information related to 1 call made to the number for the USS WHIDBEY ISLAND Commanding Officer's stateroom. This call was made at 19:48:23, UTC. The calling number associated with this call was 1-757-949-6306. This call was consistent with the time (when translated to EST), and duration of the threat made to the USS WHIDBEY ISLAND. The number dialed for this call was *67 757-462-7528. The IMEI

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provided for this call was 357730060731110.

17. *67 is a feature provided by North American telephone service providers that prevents caller information from being shown on a call receiver's display.

18. On August 11, 2017, NCIS served a subpoena on T-Mobile asking for subscriber information associated with the 1-757-949-6306 number.

19. T-Mobile responded by providing historic call information for the time period of July 31, 2017, to August 8, 2017, and associated with the number requested. The calls initially disclosed by T-Mobile, and described above, were confirmed in this historic call information. T-Mobile identified the account as being associated with ALLANTE MARTANAZE ARRINGTON. Additional information provided by T-Mobile revealed an address for Mr. Arrington on Walshingham Way, in Norfolk, Virginia, a device number consistent with the IMEI number of the phone making the threatening communications, and a phone model of BYOANDROID.

20. NCIS identified Mr. Arrington as a sailor attached to the USS OAK HILL, which is homeported at JEBLC. NCIS interviewed Mr. Arrington's commanding officer, who provided Mr. Arrington's updated cell phone number from the ship's recall roster. This number, provided to the ship by Mr. Arrington, was listed as 757-949-6306.

21. On August 17, 2017, NCIS interviewed Mr. Arrington. He provided basic biographical information, including a cell phone number of 757-949-6306. Mr. Arrington provided his cellular service provider as Metro PCS, which is a subsidiary of T-Mobile Wireless. Mr. Arrington additionally provided that he had purchased his current phone, a Samsung Galaxy, from a shipmate aboard the USS OAK HILL, but declined to provide the seller's name. He

indicated that in the past his wife had access to his phone, but that she had not had access to it in some time.

22. Pursuant to a Command Authorization for Search and Seizure issued by the Commanding Officer of JEBLC, NCIS seized Mr. Arrington's cellular telephone. The device seized matched the description provided by T-Mobile, and was a Samsung Galaxy cellular phone, utilizing an "Android" operating system. Samsung manufactures and assembles this particular device outside of the United States. Accordingly, this device is an instrument of interstate and foreign commerce.

23. Pursuant to the series of exigent circumstances requests to T-Mobile, T-Mobile also provided historic cell site location information for each threatening telephone call. NCIS plotted this information to a map, which revealed that the call at 09:59:17 UTC to the RDC was directed from a tower less than half a mile from Mr. Arrington's home on Walsingham Way, in Norfolk, Virginia. The call at 10:39:47 UTC to the RDC was directed through a tower on Bayside Road, in Virginia Beach, Virginia, between Mr. Arrington's home and JEBLC.

24. The call made to the JEBLC quarterdeck at 15:00:02 (UTC) directed through the same Shore Drive tower, aboard JEBLC.

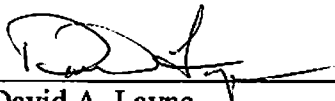
25. The call made to Rockwell Gym at 16:58:35 (UTC) directed through the Bayside Road cellular tower, between Mr. Arrington's home, and JEBLC.

26. The call made to the CO's stateroom aboard the USS WHIDBEY ISLAND directed through the cellular tower located on Shore Drive, aboard JEBLC.

27. Mr. Arrington knowingly and willfully conveyed, by telephone calls made on his personal Samsung Galaxy telephone, information regarding a bomb being aboard a U.S. Navy

installation on August 2, 2017, at approximately 6:00 a.m. (EST). The information conveyed by Mr. Arrington was malicious and false. Mr. Arrington knew that there was no bomb, to his knowledge, aboard any naval installation in the Navy Region Mid-Atlantic area. Mr. Arrington knew that his malicious communications clearly concerned an attempt being made on August 2, 2017, to damage and destroy USN property.

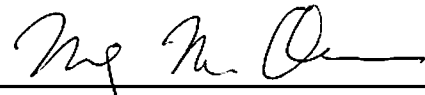
Dana J. Boente
United States Attorney

By: 
David A. Layne
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ALLANTE MARTANAZE ARRINGTON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


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I am ALLANTE MARTANAZE ARRINGTON's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Megan M. Durkee
Counsel for Defendant

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